

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**JAMES TOWNSEND AND LESLIE  
TOWNSEND,**

**Plaintiffs,**

**v.**

**MIDLAND MORTGAGE,**

**Defendant.**

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

**Civil Action No. 4:22-cv-00250**

**DEFENDANT’S AGREED MOTION TO CONTINUE SCHEDULING CONFERENCE**

Defendant Midland Mortgage (“Midland” or “Defendant”), files this its *Agreed Motion to Continue Scheduling Conference* and shows as follows:

**I. SUMMARY**

1. Plaintiffs James and Leslie Townend (collectively “Plaintiffs”) filed this action on December 29, 2021 in response to Defendant’s pursuit of a foreclosure of the real property known as 46 Barley Hall, Spring, Texas 77382 (the “Property”). (*See Petition* at ¶8.) This action was originally filed in the 284th Judicial District Court of Montgomery County, Texas, and was removed to this Court on January 25, 2022. [ECF No. 1].

2. Plaintiffs and Defendant have discussed a possible resolution of this case.

3. To avoid unnecessary attorney’s fees and expense, Plaintiff and Defendant agree that the March 4, 2022 Initial Pretrial and Scheduling Conference presently scheduled in this matter [ECF No. 3] should be continued by 30 days so that the parties may continued to discuss a resolution of this case.

**WHEREFORE, PREMISES CONSIDERED**, Defendant respectfully prays that the Court continue the March 4, 2022 Initial Pretrial and Scheduling Conference presently set in this matter by 30 days. Defendant requests all other relief to which it may be entitled.

Respectfully submitted,

By: /s/ Mark D. Cronenwett  
**MARK D. CRONENWETT**  
Attorney in Charge  
Texas Bar No. 00787303  
Southern District Bar No. 21340  
mcronenwett@mwzmlaw.com

**MACKIE WOLF ZIENTZ & MANN, P.C.**  
14160 North Dallas Parkway, Suite 900  
Dallas, Texas 75254  
Telephone: (214) 635-2650

*Attorneys for Defendant*

**CERTIFICATE OF CONFERENCE**

I hereby certify that I have conferred with Jacob Hyde, counsel for Plaintiff, and Mr. Hyde is in agreement with this motion.

/s/ Mark D. Cronenwett  
**MARK D. CRONENWETT**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served via ECF notification on February 17, 2022 on the following counsel of record:

Jacob Hyde  
Jacob.hyde.law@gmail.com  
Hyde Law, PLLC  
7 Switchbud Place, Ste. 192-275  
The Woodlands, Texas 77380  
*Counsel for Plaintiffs*

/s/ Mark D. Cronenwett  
**MARK D. CRONENWETT**